



# Shoptalk

Spring/Summer  
2005  
Vol. 15, No. 1  
Pub. #05-04-002

A PUBLICATION FOR HAZARDOUS WASTE GENERATORS

## Back to the Boneyard

Is there a boneyard behind your shop? You know, that place at the back of the lot where cast-offs rust, quietly waiting for the day they'll be useful again? If so, it's likely there's a drum or bucket (or two or three) of "stuff" you'd be better off without. And what about indoor storage areas? Do you know what's in those containers? Can you get to them quickly and safely should the need arise? Now's the time, before the busy summer season really gets going, for some spring cleaning.

First, as always, make sure anyone handling possible hazardous material is well-trained for the job and is wearing the proper protective equipment, which may include safety glasses, steel-toed shoes, respirator, etc.

You'll need to take a good look at what you have. If it's unused product, move it to the proper area where employees who need it can safely get to it. If it's something you're not likely to use, decide what you want to do with it. Services such as the Industrial Materials Exchange, will help you find people who want your unused items. You might even make a few dollars in the process! In any case, you don't need it taking up space, clear it out!

If the material is waste, you should first identify whether it has hazardous properties. That's called designation. The manufacturer should have Material Safety Data Sheets (MSDS) showing the characteristics of the product. You will also need to consider whether the product picked up any hazardous properties during use. If you are not familiar with designating waste, call your local Ecology office (phone numbers on

page 4). The technical assistance staff will be happy to help you.

Small quantity generators, (businesses that produce no more than 220 pounds of hazardous waste per month and never have more than 2,200 pounds on-site), may be able to take advantage of waste disposal services offered by local governments. Some communities even offer informal exchanges for material such as paint. Call your local waste management office or environmental health department to find out what's offered in your area. There might even be a community recycling hotline you can contact.

Some items pose special problems. The Washington Department of Agriculture collects certain old pesticides for free at special events. They also offer recycling for empty pesticide containers. Some chemicals can become unstable over time. If you see anything that's crystallized or has changed colors, you may want to talk with a professional before trying to do anything with it.

Once you've cleaned out the junk you'll have more space to store the rest. Make sure all containers are properly labeled with adequate clearance between them. Keep incompatible materials, such as ignitables and oxidizers, separate. And check the condition and volume of your secondary containment. Good secondary containment can keep a small accident from becoming a big, expensive spill.

### Useful sites for spring cleaning:

- Hazardous Waste Services Directory: [www.ecy.wa.gov/apps/hwtr/hwtd/default.htm](http://www.ecy.wa.gov/apps/hwtr/hwtd/default.htm)
- Hazardous Waste and Used Oil Facilities: [www.ecy.wa.gov/programs/hwtr/hwofacilities/index.html](http://www.ecy.wa.gov/programs/hwtr/hwofacilities/index.html)
- 2 Good 2 Toss: [www.2good2toss.com/](http://www.2good2toss.com/)
- 1-800-Recycle Assistance: [1800recycle.wa.gov/](http://1800recycle.wa.gov/)
- IMEX (Industrial Materials Exchange): [www.govlink.org/hazwaste/business/imex/](http://www.govlink.org/hazwaste/business/imex/)
- Pesticides: [www.agr.wa.gov/PestFert/Pesticides/WastePesticide.htm](http://www.agr.wa.gov/PestFert/Pesticides/WastePesticide.htm)



*Poor housekeeping can lead to accidents, not to mention dangerous waste violations.*

## Count Smart to Save

Over-counting your dangerous waste can cost you, in money and time, trying to meet requirements that don't apply. Or you may undercount and wind up improperly managing your waste, leaving you open to fines or other enforcement. What should you do?

First, count the weight of all dangerous waste you **generate** on your site in a month's time. Don't rely on the manifest amount. Manifests show the amount being sent for disposal, not how much you produce in one month.

Once you've established your actual generation amount for the month, look for any rules that reduce or exempt your waste from counting (such as WAC 173-303-016, -017 and -071). These exemptions are designed to encourage better, more efficient use and handling of hazardous substances. Any efforts you can make to reduce or eliminate the amount of waste you create (part of pollution prevention) will also reduce or eliminate the costs of handling and disposing of the material.

Some common problems related to counting waste can include:

- Adding the weight of the container holding your dangerous waste.
- Counting only the weight of wastes manifested or shipped off-site. This may be under-counting, since waste treated or recycled on-site must also be counted. Again, check the regulations for anything that may reduce the amount of waste counted when recycled.
- Guessing the weight of liquid waste. If you can, find the actual weight. If you don't have that, multiply the gallons by 8.34 lbs.

Ecology has publications online that can help you count accurately. Go to Ecology's Web site at [www.ecy.wa.gov/biblio/98414](http://www.ecy.wa.gov/biblio/98414) to download *Counting Dangerous Waste Under the Dangerous Waste Regulations*, publication #98-414, or [www.ecy.wa.gov/biblio/0304019](http://www.ecy.wa.gov/biblio/0304019) for

*Frequently Asked Questions About Recycling Credits*, publication #03-04-019.

For printed copies, call Dave Zink at (360) 407-6752 or e-mail him at [dzin461@ecy.wa.gov](mailto:dzin461@ecy.wa.gov)

For more information on counting, contact the hazardous waste specialists in your local Ecology office (see page 4 for phone numbers).

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## Building Green—Building Better

Green building has gained more recognition in the past few years, but there are still misconceptions as to what the term means. To help define green building more precisely, and offer a tool for design teams and owners, the US Green Building Council (USGBC) developed a third party certification standard called LEED™ (Leadership in Energy and Environmental Design). This scientifically-based standard has become recognized as a comprehensive measurement of green building.

In the LEED rating system, various strategies related to site development, water efficiency, energy use, material use, and indoor environmental quality are presented in a checklist. Points are awarded based on the number of strategies a project incorporates. Out of 69 possible points, a project must receive a minimum of 26 to be **certified**; 33-38 for **silver**; 39-51 for **gold**; and over 52 for the highest rating, **platinum**. While the system is not perfect, the standards continue to evolve through a comment and peer review process established by the USGBC. There are over 165 projects in the country certified to some level of LEED, with over 1,860 registered for future certification.

Under a new Washington state law (Senate Bill 5509, House Bill 1272), new public buildings over

5,000 square feet are required to meet LEED standards. The law doesn't apply to existing buildings, although the LEED program can cover them. For example, Ecology's headquarters building in Lacey recently received LEED Silver-EB (existing building) certification.

Because the construction industry has a tremendous impact on the environment, Ecology has identified green building as one of its priority initiatives to eliminate waste and toxic substances. As more people learn that the process of designing for the lowest environmental impact also provides the benefits of a healthier indoor environment and lower operational and maintenance costs, the demand for green building will continue to grow.

To learn more, visit Ecology's Sustainable Building Toolbox: [www.ecy.wa.gov/programs/swfu/cdl/](http://www.ecy.wa.gov/programs/swfu/cdl/) Or visit USGBC & LEED Web site at [www.usgbc.org/LEED/](http://www.usgbc.org/LEED/)

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## EPA Closes Call Center

On March 31, the Environmental Protection Agency (EPA) closed the call center (hotline) for the Resource Conservation and Recovery Act (RCRA) and Underground Storage Tanks (UST) programs. Callers looking for information on RCRA and UST programs will be directed to EPA's headquarters and regional office Web sites.

The primary replacement is EPA's RCRAOnline Web site at [www.epa.gov/rcraonline/](http://www.epa.gov/rcraonline/) Another site recommended by EPA is RCRA FAQs at [www.waste.custhelp.com/](http://www.waste.custhelp.com/)

EPA is continuing to operate the hotline (1-800-424-9346) for other programs: Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA, or Superfund); Emergency Planning and Community Right-to-Know Act (EPCRA); Superfund Amendments Reauthorization Act (SARA) Title III; Clean Air Act Section 112(r); and the Oil Pollution Control Act.



## Winning Companies Promote Sustainable Practices

**Corry's Fine Dry Cleaning** on Mercer Island, is the first dry cleaner in Washington to clean clothes using carbon dioxide. Corry's no longer buys (nor has to dispose of) perchloroethylene, a solvent that has contributed to groundwater contamination in many areas. While the change required a \$280,000 investment in new equipment, the company has seen a large increase in their business. And the quality of the company's work has been recognized by a national trade association.

Corry's made the change in response to customers seeking non-toxic dry cleaning. The process adds no net carbon dioxide to the environment. The change had many "ripple" effects. The facility no longer needs an air-

quality permit, the water use has stayed about the same despite the increase in business, and their employees are not being exposed to fumes.

The company has made other changes that conserve resources. Pick-up/drop-off kiosks reduce customer travel, wire hanger reuse is up to about 2,000 hangers per month, and Corry's has switched from disposable shirt boxes to re-usable shopping bags.

The company allows other dry cleaners to try out the process, helping to spread this more sustainable practice to other businesses.



*Suk Bong Lee, Mija Lee and Seung Lee, of Corry's Dry Cleaning, accept their award from Tom Fitzsimmons, the governor's Chief of Staff.*

**Granum Inc.**, in Seattle, manufactures Choice Organic Teas, a line founded on the principles of sustainable agricultural practices and organic farming. Many of the teas are Fair Trade Certified™, which ensures a reasonable return to the farmers and their communities. Granum was an early entrant into the organic product field and the first US tea crafter to introduce Fair Trade Certified™ teas.

The company counterbalances its facility energy use by buying green certificates for wind power. This amounts to 240,000 kilowatt hours and 160,920 pounds of (greenhouse gas) carbon dioxide offsets.

Granum uses recycled and recyclable material in its packaging and office supplies, has replaced facility lighting fixtures with low mercury, high efficiency units, and rewards employees who use alternative transportation to



*Raymond Lacorte, Autumn White and Blake Rankin, of Granum, Inc., accept their award from Tom Fitzsimmons, the governor's Chief of Staff.*

commute. The company participated with student groups in World Fair Trade Day activities, educates its employees in sustainability and pollution prevention, and donates ten cents for every box of Choice Organic Teas sold at Puget Consumer Coop stores to a fund to save local farmland.

## Video Offers Pesticide Alternatives

The Departments of Ecology and Health are offering a free video, *Healthier Solutions*, for people interested in safer lawn and garden care. The video was developed specifically for junior and high school students.

The video is designed to generate discussion among students about the safety issues and options associated with lawn and garden care and related chemicals. The tape comes with a list of teaching resources to support expanded discussion, questions about the topic and how biology and chemistry are closely inter-related to human activities and human health. The Office of Superintendent of Public Instruction is distributing the video to all public and private junior high and high schools in the state.

For more information or a copy of the video, please contact Maria Victoria Peeler, (360) 407-6704, or e-mail at: [peel461@ecy.wa.gov](mailto:peel461@ecy.wa.gov)

**Q When I hire a contractor to work at my site, who is responsible for dangerous wastes that are generated?**

**A** You are. Commercial property owners and managers (the dangerous waste rules do not apply to homeowners) are responsible for the dangerous wastes generated on their property. Contractors can assist you in managing the waste, but the waste would be counted towards your generator status and would need to be manifested off-site from your property for recycling or treatment. Contractors should not take wastes generated at the work site back to their shop. This activity is illegal transportation of dangerous wastes.

Contractors are responsible for wastes that originate on their own property. If a contractor generates waste at his or her own shop (e.g., to strip and re-finish salvaged wood) he or she would be generating and manifesting that resulting waste under their shop's RCRA (Resource Conservation and Recovery Act) Site Identification number.

Contractors can leave leftover paint, caulk and other materials for you to use during future maintenance because "touch-up" products are not considered waste.

**Q When is it necessary to obtain a RCRA Site Identification (ID) number?**

**A** A RCRA Site ID number must be obtained if a site is generating regulated amounts of dangerous waste. For example, a construction site that has no previous RCRA Site ID number must obtain an ID number if hazardous wastes are generated at or above the small quantity generator levels (220 pounds per month/batch or 2.2 pounds per month/batch for extremely hazardous wastes). A contractor who generates dangerous waste on a site that already has a RCRA Site ID number must use the existing Site ID number. Any waste generated on the site would be reported on that site's annual report forms.

Remember, the RCRA Site ID number is assigned to a geographic location, so it can't be used for waste generated at more than one site.

For questions about getting a RCRA Site ID number, contact the Ecology at (360) 407-6737 or toll-free from within the state at 800-874-2022.

If you have questions about specific dangerous wastes or their management, contact your regional office listed on this page.

## Department of Ecology

Remember, your business is liable for all hazardous wastes generated. If you are uncertain about your responsibilities as a hazardous waste generator, call your nearest Ecology office and ask for a hazardous waste specialist. For information on reducing or recycling hazardous waste, ask for the toxics reduction staff, also at the following numbers:

Bellevue: (425) 649-7000  
Lacey: (360) 407-6300  
Yakima: (509) 575-2490  
Spokane: (509) 329-3400

If you need this information in an alternate format, please call the Hazardous Waste and Toxics Reduction Program at 360-407-6700. If you are a person with a speech or hearing impairment, call 711, or 800-833-6388 for TTY.

**Shoptalk** is produced by the Washington State Department of Ecology's Hazardous Waste and Toxics Reduction Program. Editor: Mariann Cook Andrews (360) 407-6740 E-mail address: [maco461@ecy.wa.gov](mailto:maco461@ecy.wa.gov) Production Team: Cathy Bouge, Joan Morris Technical Editor: Chipper Hervieux Contributors: Mariann Cook Andrews, Thomas Cusack, Nancy Mears, Maria Victoria Peeler Distribution/Mailing List: Visit Shoptalk online at <http://www.ecy.wa.gov/programs/hwtr/shoptalkonline> and subscribe to this free newsletter while you're there.

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